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September 25, 2015

**Via ECF and Federal Express**

Honorable Jose L. Linares, U.S.D.J.  
United States District Court  
Martin Luther King Federal Building  
50 Walnut Street  
Newark, New Jersey 07102

Re: *DeFiesta v. Volkswagen Group of America*  
Civil Action No. 15-7012 (JLL)(JAD)

*Minkina v. Volkswagen Group of America*  
Civil Action 15-7020 (JLL)(JAD)

*Ghezzi v. Volkswagen Group of America*  
Civil Action No. 15-7035 (JLL)(JAD)

*Stein v. Volkswagen Group of America*  
Civil Action No. 15-7052(JLL)(JAD)

*Williams and McGrath v. Volkswagen Group of America and Volkswagen AG*  
Civil Action No. 15-7053(JLL)(JAD)

*Levin v. Volkswagen Group of America*  
Civil Action No. 15-6985 (JLL)(JAD)

*Criston v. Volkswagen Group of America*  
Civil Action No. 15-6988(JLL)(JAD)

Dear Judge Linares:

This firm, along with others, represent Plaintiffs in numerous class actions now pending before Your Honor against Volkswagen Group of America, Inc. ("VW").

Your Honor has scheduled an in-person conference for this coming Tuesday, September 29 at 12:00 p.m. I am writing this letter with the consent of defense counsel to request a brief adjournment of the status conference from September 29 until October 20, if that date is

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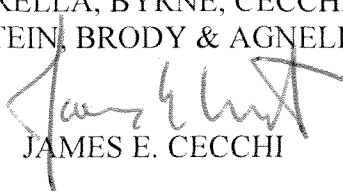
acceptable to Your Honor. During the period of the adjournment defense counsel will have an opportunity to consult with its client about the issues raised in our submission.

In addition, I have enclosed a form of Order which appoints Interim Co-Liaison Counsel which was one of the requests for relief sought in our Order To Show Cause. I am authorized to represent that defendant takes no position regarding this aspect of our application. In addition, as noted in our submission yesterday, I can also represent that all counsel who have filed cases in New Jersey support our Interim Co-Liaison appointment. We think it makes eminent sense here as it gives all counsel, the Court, and the defendant a single point of contact so that this important litigation in New Jersey can be efficiently and productively managed. We are hopeful that Your Honor agrees and both parties are in accord that the Application for an Order to Show Cause should be held in abeyance pending the status conference. Of course, should Your Honor have any questions regarding the Interim Liaison appointment or the requested adjournment of the status conference, we are available to speak at your convenience.

Thank you for Your Honor's attention.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO



JAMES E. CECCHI

cc: Honorable Joseph A. Dickson, U.S.M.J. (Via ECF and Federal Express)  
All Counsel (via ECF)